REMARKS

Claims 1-30 were previously pending in this application. By this amendment, Applicant is canceling claims 19-30 without prejudice or disclaimer as being directed to non-elected inventions. Claims 1, 2, 4-11, 13 and 15 are amended and new claims 31-38 are added. As a result, claims 1-19 and 31-38 are pending for examination, with claims 1 and 31 being independent claims. No new matter is added.

Claim Objections

Applicants have amended claims 1, 11 and 15 to address the informalities noted by the Examiner. Accordingly, the objections to the claims should be withdrawn.

Claim Rejections - 35 U.S.C. §102 (Zangenehpour)

Claims 1, 5-7 and 12 are rejected under 35 U.S.C. §102(b) based on Zangenehpour. Applicant respectfully disagrees. Claim 1 has been amended to recite that the new item to be stored has an address associated with it. The claim has been amended to more clearly identify the nature of the priority information used in selecting a cache location for storing the item. Specifically, claim 1 recites "associating a priority with the new item based on the address associated with the item." Zangenehpour does not teach priority relating to an address associated with an item to be stored. Accordingly, Zangenehpour does not teach or suggest the claimed method.

Zangenehpour, though it uses the term "priority," describes an improved method of implementing a least recently used replacement algorithm (see, e.g., Abstract). In a least recently used replacement algorithm, a new item is inherently assigned the highest priority. Other items already stored in the cache are given lower priorities assigned based on how recently those items were accessed. Accordingly, the reference does not teach or suggest any step comparable to "associating a priority with the new item based on the address associated with the item."

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Claims 5-7 and 12 depend from claim 1 and distinguish over Zangenehpour for at least the same reasons as claim 1. Additionally, each of the dependent claims recites limitations that further distinguishes over the reference. For example, claim 5 recites "otherwise not storing the new item and treating the new item as not cacheable." No such operating condition occurs with the least recently used replacement algorithm of the reference. Accordingly, the rejection of claims 1, 5-7 and 12 should be withdrawn.

Claim Rejections - 35 U.S.C. §103

Claims 2-4, 8-12 and 13-18 are rejected under 35 U.S.C. §103 based on Zangenehpour and one of Tago, Ozawa or Abe. Applicant respectfully asserts that the claims as amended distinguish over the references, whether considered alone or in combination.

For the reasons described above, Zangenehpour does not teach or suggest all of the limitations of claim 1 assessed by the Examiner in making the rejection. The claims rejected under 35 U.S.C. §103 depend directly or indirectly from claim 1 and therefore incorporate the limitations of claim 1 that are not shown or suggested in Zangenehpour. Even if Zangenehpour were combined with Tago, Ozawa or Abe, the combination could not teach or suggest all limitations of any of the rejected claims. Accordingly, the rejection under 35 U.S.C. §103 should be withdrawn.

New Claims 31-38

Newly added claims 31 through 38 also distinguish over the references of record. Independent claim 31 recites "an item having an address" and "a data table to identify a plurality of blocks of address in memory...and a priority associated with each of the plurality of blocks." The claim further recites "selectively storing an item in a location of the plurality of locations selected based on a relative priority of the priority obtained and the priorities associated with the plurality of locations." The least recently used replacement algorithm described in Zangenehpour does not associate priorities with memory addresses. Accordingly, the reference does not teach or suggest a data table or selectively storing an item in a fashion that meets all

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limitations of claim 31. It follows that other related limitations also are not met, such as:
"obtaining from the data table a priority associated with the block of the plurality of blocks of
addresses containing the addresses associated with the item." Accordingly, new claim 31
contains multiple limitations that distinguish the art of record.

New claims 32-38 dependent from claim 31 and should be allowed for at least the same
reasons.

CONCLUSION

In view of the above amendment, applicant believes the pending application is in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Dated: July 3 1 , 2007   Respectfully submitted,

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